

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA

FILED

01/15/2024

**D. G. Sweigert
Plaintiff,**

-against-

**Air Force civilian employee Matthew
Benassi,
U.S. National Institute of Health,
U.S. Coast Guard,
U.S. Department of Homeland Security,
U.S. Department of Justice,
U.S. Air Force,
Defendants**

PRO SE

Assigned to:

1:24-cv-95-RLY-KMB

Referred to:

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk

COMPLAINT

MAY IT PLEASE THE COURT, by the Court's leave, *pro se* Plaintiff hereby files this
Complaint.

This is a sworn pleading.

January 16, 2024 (1/16/2024)



**D. G. SWEIGERT PRO SE PLAINTIFF, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719**

BACKGROUND

This is a garden variety action to enforce the Freedom of Information Act (F.O.I.A.), and the document requests submitted by the Plaintiff, against federal agencies of the U.S. Government that have refused to comply with legal requests for documents. This action is brought to compel these agencies to release documents under F.O.I.A.

In all cases, the U.S. Government defendants have received numerous F.O.I.A. requests with a warning of pending litigation. None have taken action to release documents requested by lawful F.O.I.A. requests.

JURISDICTION

This legal action is filed pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.

INTRODUCTION

It is alleged, based on Plaintiff's reasonable belief, that the refusal to comply with the F.O.I.A. requests centers around the U.S. Government's involvement with conspiracy theorists Jerome Corsi, PhD of New Jersey, suspended attorney Larry E. Klayman of Miami, Klayman's protégé YouTuber Jason Goodman, operator of "21st Century 3D", of New York City and Twitter gadfly George Webb Sweigert (see related litigation) of Atlanta, Georgia. Members of the U.S. Government appear afraid to comply with these F.O.I.A. requests for fear of social media retaliation by these anti-government personalities.

It is very apparent that the U.S. Government is withholding requested document as several offices are embarrassed about their relationships with conspiracy theorists that manufacture fake news on behalf of Russia, see CrowdSource the Truth a Russian disinformation operation.

U.S. Coast Guard's Bungling Response to Internet Hoax

Below is an example of a response received by the U.S. Coast Guard, a component of the U.S. Department of Homeland Security.

On 11/13/2023 5:52 AM PST Schalles, Lawrence C Jr LT USCG SEC CHARLESTON (USA) <lawrence.c.schalles@uscg.mil> wrote:

Good morning,

I will forward these documents to our legal team, once they give their approval I will forward them to you. Please understand this process might take a few days.

V/R

**LT Lawrence C. Schalles
Marine Investigations
U.S. Coast Guard
Sector Charleston
Office: (843) 740-3180 ext. 3320**


The U.S.C.G. has acknowledged only one of dozens (see above) dozens of requests for documents created during a “dirty bomb hoax” which evacuated the Port of Charleston, South Carolina, June 14, 2017. YouTuber Jason Goodman (owner of 21st Century 3D), published a YouTube live stream video on June 14, 2017 on his YouTube channel “Jason Goodman”. The video live stream in question featured the Plaintiff’s brother, George Webb Sweigert.

Cable News Network (C.N.N.) “reporter” Donie O’Sullivan was the key media personality that documented the Port of Charleston “dirty bomb hoax”. Interestingly it was Donie O’Sullivan who would receive an EMMY AWARD for another story about George Webb Sweigert in 2020.


In 2017 with 2,000 live viewers, Goodman, after announcing and publishing a maritime agency’s non-public emergency phone number, and then personally telephoned that number (on air), as did several other viewers, the watch commander of the U.S. Coast Guard station at the Port of

Charleston, South Carolina, who based upon Goodman live stream immediately closed the Port and initiated a full-scale response to a radiation dispersal device (RDD).


With a telephone call Mr. Goodman, lifelong friend of SPUTNIK disinformation reporter Lee Stranahan, made the U.S.C.G. watch commander aware of a hoax dirty bomb on the Motor Vessel Memphis Maersk, which was docking at the exact moment (June 14, 2017). The Captain of the Port The video appears at URL: [https://odysee.com/@Crowdsourcethetruth:d/Clear-and-Present-Danger-\(Calm-Before-the-Storm\)--maerskmemphis:5](https://odysee.com/@Crowdsourcethetruth:d/Clear-and-Present-Danger-(Calm-Before-the-Storm)--maerskmemphis:5) As reported in the N.Y. Times, Cable News Network, Associated Press and at least 20 other news services both Goodman and “George Webb” were cited as causing the “dirty bomb hoax”. Estimates are that 50 to 100 emergency personnel responded to the event.


Time Magazine
<https://time.com> › U.S. › South Carolina ›

Port of Charleston: Conspiracy Theorist Shut Down Terminal
Jun 15, 2017 — Authorities **shut down** a section of the Port of Charleston Wednesday night after a **conspiracy theorist** called in a false bomb threat.


CNN.com
<https://money.cnn.com> › 2017/06/16 › media › port-o... ›

How a conspiracy theory closed part of a major US seaport
Jun 16, 2017 — During the broadcast, **conspiracy theorist** George Webb initially claimed a “source” had told him that there was “a dirty bomb planned for a major ...


The New York Times
<https://www.nytimes.com> › port-dirty-bomb-south-carolina ›

How a Conspiracy Theorist's Call About a Dirty Bomb Shut ...
Jun 15, 2017 — A section of the Port of Charleston in South Carolina was **shut down** for several hours Wednesday night after a tip from a far-right YouTube ...

The news articles cited above are herein explicitly referenced, incorporated and relied upon. Mr. Goodman and George Webb Sweigert operated in a conspiracy with Oakey Marshall Richards, a U.S. Government confidential informant that was supervised by the Chief U.S.

Marshall for West Virginia¹. Mr. Goodman arranged for Oakey Marshall Richards (OMR) to act as a social media personality for thirty (30) social media podcasts under the watchful eye of GOOGLE, LLC the operator of YouTube.Com.

The fall-out of the Goodman-Webb-OMR love affair

Following the Port of Charleston “dirty bomb hoax” George Webb (Sweigert), OMR and Jason Goodman “broke up” in a Dean Martin – Jerry Lewis fashion. Those social media followers that were anti-George Webb embraced Goodman’s social media channels known as “CrowdSource The Truth” (C.S.T.T.). To this day, Jason Goodman (252 7th Avenue, Apt. 6-S, New York N.Y. 10001) is the undisputed leader of so-called “anti-George Webb opposition” that is the core mission of C.S.T.T. It is estimated that C.S.T.T. is a Russian disinformation service that is composed of 90% of Geroge Webb haters. OMR acted as the chief news correspondent for the remainder of 2017 on Goodman’s podcasts (as directed by the Chief U.S. Marshall for West Virginia).

The U.S.C.G. has refused dozens of requests from the Plaintiff for documents related to the Port of Charleston “dirty bomb hoax”, which is alleged to have involved Goodman and Webb’s friend at the time Jerome Corsi, PhD of New Jersey (a former “reporter” for the conspiracy social media channels operated by Alex Jones (Austin, Texas)²). Corsi is a former protégé of propagandist Edward Bernays³.

¹ <https://www.washingtonpost.com/archive/politics/1997/08/26/firefighter-guilty-for-giving-militia-plan-of-fbi-site/91d88192-eb5-4d01-9614-bb9b7e63186a/>

² <https://www.conspiracyarchive.com/2019/03/04/the-genius-of-the-few-the-collapse-of-jerome-corsis-deep-state-narrative-part-2/>

³ <https://streamable.com/2tba6>

U.S. Air Force refusal to provide F.I.O.A. documents

Dear Mr. Sweigert,

This is an interim response to your 13 July 2021, Freedom of Information Act (FOIA) request for "documents related to the assignment of the following Air Force civilian employee: Matthew Benassi."

Our office is still actively processing your request and we are currently pending a response from our action office; therefore, additional time will be needed to properly process your request. We will provide you with updates regarding the status of your case when information is received. Please be assured that we are processing your request as quickly as possible and would like to thank you for your patience.

Due to limited manning, please direct any questions to Mr. Jonathan Staeblein at 703-692-9979 or SAF.AA.HAF.FOIA.workflow@us.af.mil and refer to your case number in your inquiry.

Very Respectfully,

JONATHAN STAEBLEIN, GS-12, DAF
SAF/AII (FOIA)
Office of the Secretary of the Air Force
1000 Air Force Pentagon
Washington, DC 20330-1000

The Department of the Air Force has only sent acknowledgement messages like the one seen above; the Department has provided no responsive documents to date (after two years).

Department of the Air Force civilian employee Matthew Benassi is alleged to be an associate of Corean Elizabeth Stoughton, a resident of Columbia, Maryland where she lives with her father (Ron Stoughton⁴) a former contractor for the U.S. National Security Agency, Fort Meade, Maryland.

Based upon evidence in the public domain, and statements made by Corean Elizabeth Stoughton, George Webb Sweigert was set-up to be a "patsy" for a Cable News Network (C.N.N.) expose'

⁴ <https://www.ietf.org/rfc/rfc21.html>

concerning the outbreak of the COVID 19 virus at the Wuhan Military Games in China during October 2019⁵.



Exclusive: She's been falsely accused of starting the pandemic. Her life has been turned upside down



<https://www.cnn.com/2020/04/27/tech/coronavirus-conspiracy-theory/index.html>

Corean Elizabeth Stoughton, a “bondage and discipline Sadio-masochist (BDSM)” practitioner is the former girl friend of George Webb Sweigert and became an associate with YouTuber Jason Goodman, who is a known Russian disinformation affiliate of the State news organization SPUTNIK, to pass on personal information on her ex-boyfriend to the anti-George Webb *CrowdSource The Truth* group via e-mail messages. It was Ms. Stoughton who lured George Webb into a sexual relationship with leather, whips and chains.

⁵ Exclusive: She's been falsely accused of starting the pandemic. Her life has been turned upside down - Story by Donie O'Sullivan, CNN Business Video by Richa Naik and John General, CNN Business Photographs by Heather Fulbright, CNN, Updated 10:17 AM EDT, Mon April 27, 2020

George Webb publicly claimed to have had a tryst with BDSM porn star Janine Lindenmeyer. Apparently, Ms. Stoughton was a Lindenmeyer replacement that catered to George Webb's taste for "bondage and discipline" in a setting of leather restraints at the Country Inn, Capitol Heights, Maryland. The same hotel where Jenny Marie Moore, George Webb's previous girlfriend, was found dead by hotel staff, August 13, 2018 (while George Webb Sweigert and Corean Elizabeth Stoughton were simultaneously guests at the same hotel (six (6) rooms away).

This personal BDSM information on George Webb was also sent via e-mail messages to Matthew Benassi and to corporate officers of C.N.N. by Stoughton in preparation of the C.N.N. Wuhan Military Games story featuring George Webb. Corean Elizabeth Stoughton acted as a go-between liaison between Mr. and Mrs. Benassi, C.N.N., and Youtuber Jason Goodman to produce the story. Donie O'Sullivan published the story for which he received an EMMY Award.



<https://www.irishtimes.com/lifestyle/people/arid-40347206.html>

NEW YORK (July 27, 2021; Revised 9.21.21) – Nominations for the 42nd Annual News and Documentary Emmy® Awards were announced today by The National Academy of Television Arts & Sciences (NATAS).

Outstanding Short Feature Story in a Newscast

CNN Business

CNN

Conspiracy Theorists Said She Started the Coronavirus Pandemic. Now She's Afraid for Her Life

Senior Producer

Logan Whiteside

Producers

John General, Jeremy Moorhead, Richa Naik

Reporter

Donie O'Sullivan

https://theemmys.tv/wp-content/uploads/2021/09/2021-42nd_News-Doc_Emma_Awards-Nominations-Final-rev.-9.21.21.pdf

While serving as a U.S. Air Force civilian employee, Matthew Benassi wrote an editorial for C.N.N. advocating for the amendment of the Communications Decency Action, Section 230. The U.S. Air Force has refused all F.O.I.A. requests for e-mail messages exchanged between Matt Benassi and C.N.N. via Benassi's official U.S. Air Force e-mail account.



<https://www.cnn.com/2020/10/23/perspectives/section-230-disinformation-hate-speech-social-media/index.html>

⁶ A conspiracy theory almost ruined my family's life. This could prevent it from happening to you. Opinion by Matthew Benassi for CNN Business Perspectives - 4 minute read Published 8:12 AM EDT, Fri October 23, 2020

U.S. National Institute of Health

Russian disinformation YouTuber Jason Goodman, who was one of the January 6, 2021 rioters at the U. S. Capitol, has recently launched new social media attacks against an employee for the National Institute of Health (N.I.H.) named David Sweigert. Goodman is convinced that David Sweigert of N.I.H. is developing contracts concerning the proliferation of on-line disinformation, misinformation and malformation.

On 11/19/2023 8:52 AM PST Spoilation Notice <spoliation-notice@mailbox.org> wrote:

This is a Freedom of Information Act (FOIA) request.

See your agency's implementing regulations:
Freedom of Information Regulations
A Rule by the Health and Human Services Department on 10/28/2016

Forward at once to your agency's FOIA Officer.

Request is made for the following:

All records pertaining to N.I.H. contractor David Sweigert.

This includes all r-mail messages sent or received to the e-mail box Dave.Sweigert@NIH.GOV

This includes records of all telephone calls made from telephone 301-496-3014.

This includes all contract documents, statements of work and other contractual artifacts relied upon to engage David Sweigert.

A FOIA lawsuit will be commenced against N.I.H. in ten (10) days if the documents are not received.

Best,

D.G. Sweigert

U.S. Department of Justice cover-up of Larry Klayman “indictments”

Goodman also formed a close relationship with anti-government “Special Prosecutor” Larry E. Klayman⁷ to create dozens of social media podcasts for “Civil Grand Jury” investigations into federal jurists of the District of Columbia. After such broadcasts, with Goodman acting as the official grand jury “recorder”, criminal referrals were sent to the U.S. Department of Justice by Mr. Klayman⁸.

Alarming in what amounts to judicial intimidation, Mr. Klayman has stated, with Mr. Goodman looking on, that federal court justices face indictment by the Citizens Grand Juries if they violate their oath of office and do not rule in favor of his clients (Citizen's Grand Jury with Prosecutor Larry Klayman – The Kerry Biden Connection, April 29, 2021, https://www.youtube.com/watch?v=ssv_EhkfzqY&t=3014s)⁹.

⁷ Atty Larry Klayman Fights Bid To Disbar Him In DC

By Alison Knezevich · December 21, 2023, 7:46 PM EST

Larry Klayman, an attorney who has taken up a variety of conservative causes over his decades long career, on Thursday urged a Washington, D.C., legal disciplinary board not to suspend his law license.

<https://www.law360.com/pulse/dc-pulse/articles/1779851/atty-larry-klayman-fights-bid-to-disbar-him-in-dc->

⁸ June 6, 2023, 11:45 AM PDT

DC Circuit Suspends Attorney Klayman as Reciprocal Discipline

- Klayman suspended by DC Court of Appeals in September
- DC Circuit found no reason to stay 18-month suspension

<https://news.bloomberglaw.com/us-law-week/dc-circuit-suspends-attorney-klayman-as-reciprocal-discipline>

⁹ FORMER DOJ LAWYER CONVENES ‘CITIZENS GRAND JURY’ TO INDICT U.S. OFFICIALS

<https://www.splcenter.org/fighting-hate/intelligence-report/2015/former-doj-lawyer-convenes-%E2%80%98citizens-grand-jury%E2%80%99-indict-us-officials>



Jason Goodman (left) and Larry Klayman (right)



Citizen Grand Jury “recorder” sovereign citizen Goodman in gray suit (Jerome Corsi on screen). Allegedly, the “indictments” against several District of Columbia federal jurists (produced by Klayman and Goodman) were transmitted to the U.S. Attorney General. A dozen FOIA requests to that office for copies of these “indictments” has been ignored.

Russian Connection

Mr. Goodman has two ex-wives, one Brazilian and one Ukrainian (Tatyana Petruk¹⁰). Ms. Petruk is currently a resident in Florida and a comedy dance performer at the EPCOT CENTER¹¹. Goodman has broadcast a dozen podcasts with U.S. fugitive and felon John Mark Dugan while he was embedded with Russian combat troops in the Ukraine in the summer of 2023. Dugan is apparently good-friends with Russian SPUTNIK employee Lee Stranahan.

It is instructive to note that Goodman directed a cyber mob in May 2022 to hound and harangue a pregnant federal civil servant employed by the U.S. Department of Homeland Security (D.H.S.) named Nina Jankowicz (an expert in Russian propaganda and author of the book “*How To Lose The Information War, Russia, Fake News and the Future of Conflict*”, published by I.B. Tauris, London, 2020) who endured at least two (2) late night telephone calls by Goodman, who broadcasted the calls to thousands on his social media podcast shows. Nina Jankowicz was forced to obtain civil protection orders from the Arlington (Virginia) General District Court (<https://www.vacourts.gov/courts/gd/arlington/home.html>) against Goodman for his apparent on-line threatening behavior of her new born baby.

¹⁰ Founder of AerialArtistry.com

¹¹ <https://www.facebook.com/tatyana.petruck/>

ARLINGTON COUNTY POLICE DEPARTMENT SUMMARY INCIDENT REPORT

REPORT NUMBER: 2023-01064022



INCIDENT INFORMATION							
INCIDENT CODE HARASS	INCIDENT TYPE Annoying Phone Calls	INITIAL SUPP	DATE/TIME STARTED 05/12/2022 02:38 PM	DATE/TIME ENDED 01/05/2023 04:00 PM	DATE/TIME REPORTED 01/05/2023 04:20 PM		
REPORT FILED FROM 173.66.125.240	TRACKING NUMBER T23000083	LOCATION OF OCCURRENCE [REDACTED]			APPROVED BY: 1315/J. Adams		
LOCATION TYPE Other/Unknown	THEFT TYPE	METHOD OF ENTRY	METHOD OF EXIT	PT OF ENTRY	PT OF EXIT	ENTRY LOC	

PERSON LISTINGS										
TYPE Victim	LAST NAME Jankowicz	FIRST NAME Nina	MIDDLE NAME [REDACTED]	DOB [REDACTED]	RACE White	SEX F	DRIVER LIC NO	LIC ST		
SSN	ETHNICITY Non-hispanic Or	RESIDENT Resident	EYE COLOR	HAIR COLOR	AGE	HEIGHT	WEIGHT	CELL PHONE		
1	EMAIL [REDACTED]	RESIDENCE ADDRESS [REDACTED]					HOME PHONE [REDACTED]			
	EMPLOYER NAME	BUSINESS ADDRESS [REDACTED]					WORK PHONE [REDACTED]			

RETURNS: Each person was served according to law, as indicated

RESPONDENT:	
NAME <u>Goodman, Jason</u>	
ADDRESS <u>252 7th Ave #605</u> <u>New York, NY 10001</u>	
<input checked="" type="checkbox"/> PERSONAL SERVICE	TELEPHONE NUMBER <u>347-380-6998</u>
<input type="checkbox"/> NOT FOUND	
Serving Officer <u>Deputy Y. Lopez 51312</u>	
for <u>Sheriff Jose Quiróz</u>	
DATE AND TIME <u>02/14/2023</u> <u>1505 hours</u>	
RESPONDENT'S DESCRIPTION (for VCIN entry):	
RACE <u>W</u>	SEX <u>M</u>
DOB: <u>04/07/1972</u>	
HGT <u>5'7"</u>	WGT <u>150</u>
EYES <u>Green</u>	HAIR <u>Brown</u>
SSN <u>089-50-7157</u>	
Tel. No. <u>347-380-6998</u>	
Relationship to Petitioner/Plaintiff <u>none</u>	
Distinguishing features <u>none</u>	

Jankowicz was hounded in the exact same manner as a U.S. State Department employee in the lawsuit brought against Alex Jones and Stranahan (which both lost)

<https://www.courtlistener.com/docket/6333356/gilmore-v-jones/>. This time Goodman's video productions (which included late night phone call recordings to Jankowicz) were rebroadcasted on the notorious Alex Jones controlled *Banned.Video* conspiracy platform.

Soon after the Goodman phone calls and cyber mob videos Jankowicz was forced to quit her D.H.S. job, which gave Stranahan an opportunity to praise Goodman's antics.





Is Nina Jankowicz merely a frustrated Broadway showtunes songstress or is she a dangerous subversive operative working to undermine the U.S. government from within? In this report, Jason Goodman of Crowdsource the Truth reveals unimpeachable evidence indicating Nina may actually work for the Zelenskyy government, has received numerous payments to a shadowy LLC from non-U.S. NGOs and has failed to register under the foreign agent registration act. Hear Nina herself, and her colleagues at The Brookings Institution, The Wilson Center and others as Goodman teases out admissions that almost certainly lead to the immediate dissolution of the Orwellian Disinformation Governance Board. Produced by CrowdSourceTheTruth.com

<https://banned.video/watch?id=62852a24d04a760673700d2c>



D.H.S. has refused to acknowledge and release numerous requests for files on Ms. Jankowicz.

CAUSES OF ACTION

COUNT ONE

Violation of the Freedom of Information Act, 5 U.S.C. § 552 for Failure to Respond Within the Time Required

- All Government Defendants sued for Agency failure to respond to the FOIA request. 5 U.S.C. § 552(a)(6)(A)(i). This claim stems from the agency's failure to meet the deadlines that Congress established.

COUNT TWO

Violation of the Freedom of Information Act, 5 U.S.C. § 552 for Failure to Conduct an Adequate Search

- All Government Defendants sued for Agency conducting an inadequate search. 5 U.S.C. § 552(a)(3)(C).

COUNT THREE

Violation of the Freedom of Information Act, 5 U.S.C. § 552; Wrongful Withholding of Records

- All Government Defendants sued for Agency improperly withholding records. 5 U.S.C. § 552(a)(3)(A).

PRAYER FOR RELIEF

Plaintiff seeks seek a declaration from the Court stating the agency violated 5 U.S.C. § 552(a)(6)(A)(i). The declaratory relief sought is directly related to the alleged F.O.I.A. violations.

Plaintiff seeks an Order from the Court directing the agency to take certain actions to remedy the agency's failures under F.O.I.A. The Order should direct the agencies to conduct a search and to produce responsive documents.

Certified under penalties of perjury.

January 16, 2024



**D. G. SWEIGERT PRO SE PLAINTIFF, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719**

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

D. G. SWEIGERT,

Plaintiff,

- against -

JASON GOODMAN, ET AL.,

Defendants.

23-cv-5875 (JGK)

23-cv-6881 (JGK)

ORDER

JOHN G. KOELTL, District Judge:

X Corp. and Alphabet, Inc. are dismissed without prejudice.

The conference scheduled for November 20, 2023, is canceled.

The Clerk is directed to close ECF No. 53.

SO ORDERED.

Dated: New York, New York
November 10, 2023



John G. Koeltl
United States District Judge